

CLARA R. SMIT, ESQ.  
ATTORNEY AT LAW  
100 HORIZON CENTER BOULEVARD  
HAMILTON, NJ 08691  
(732) 843-6600  
ATTORNEY FOR THE PLAINTIFF

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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J.C.,

**Plaintiff**

v.

ROWAN UNIVERSITY,

**Defendants**  
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**CIVIL ACTION NO.:**

**NOTICE OF MOTION TO  
SEAL THE COMPLAINT**

**PLEASE TAKE NOTICE** that the undersigned Attorneys for the Plaintiff, J.C., requests that complaint in this matter be sealed.

1. This action involves the medical history of Plaintiff and if unsealed could further cause plaintiff to be discriminated against.

2. For reasons of privacy, the plaintiff requests that he be referred to only by his initials.

WHEREFORE, for the reasons stated above, the plaintiff requests that the Court seal the unredacted complaint, and allow in all public documents to be referred to by initials only, and for such other and further relief as is just and proper.

In support of the foregoing, Plaintiff will rely upon the annexed Certification and proposed order.

/s/ Clara R. Smit, Esq.  
Clara R. Smit, Esq.  
Attorney for Plaintiffs

Dated: April 20, 2017

CLARA R. SMIT, ESQ.  
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100 HORIZON CENTER BOULEVARD  
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ATTORNEY FOR THE PLAINTIFF

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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J.C.,

**Plaintiff**

v.

**CIVIL ACTION NO.:**

ROWAN UNIVERSITY,

**Defendants**  
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**CERTIFICATION OF SERVICE**

I hereby certify that on April 17, 2017, I caused to be served via United States Mail, a true and correct copy of (1) Notice of Motion to Seal Complaint, (2) Certification of Clara R. Smit, Esq., (3) Proposed Order along with this Certificate of Service, and (4) Complaint on:

ROWAN UNIVERSITY

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and is correct.

Respectfully submitted,  
/s/ Clara R. Smit, Esq.  
Clara R. Smit, Esq.  
Attorney for Plaintiffs

Dated: April 20, 2017

CLARA R. SMIT, ESQ.  
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**UNITED STATES DISTRICT COURT  
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J.C.,

**Plaintiff**

v.

**CIVIL ACTION NO.:**

ROWAN UNIVERSITY,

**Defendants**  
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**ORDER**

This matter having been opened to the Court by Clara R. Smit, Esq., Attorney for the Plaintiff, on a Motion for an Order sealing Plaintiff's Complaint and all other public filings and the Court having read and considered the papers, and for good cause shown;

**IT IS** on this       day of       , 2017; it is hereby

**ORDERED** that Plaintiff's Complaint is Sealed; and it is further

**ORDERED** that a copy of this Order be served upon parties within seven (7) days of the date of its entry.

\_\_\_\_\_  
Honorable

CLARA R. SMIT, ESQ.  
ATTORNEY AT LAW  
100 HORIZON CENTER BOULEVARD  
HAMILTON, NJ 08691  
(732) 843-6600  
ATTORNEY FOR THE PLAINTIFF

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

-----  
J.C.,

**Plaintiff**

v.

**CIVIL ACTION NO.: 2:16-cv-04540**

ROWAN UNIVERSITY SCHOOL OF  
OSTEOPATHIC MEDICINE and  
ROWAN UNIVERSITY,

**Defendants**  
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**CERTIFICATION OF CLARA R. SMIT. ESQ.**  
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I, Clara R. Smit, of full age, do hereby certify that:

1. I am the attorney for the plaintiff in the above-mentioned matter and as such am fully familiar with the facts. I make this certification in support of my motion for an Order sealing the complaint in this action.
2. Plaintiff seeks such an order to protect against the public having specific knowledge of the medical conditions that have led Plaintiff to bring a law suit. If Plaintiff's identity is known, the conditions which he suffers from could become known to his employer and that may cause further discrimination. (See a true copy of Complaint attached as Exhibit A).

3. In view of the foregoing, it is respectfully requested that an Order permitting Plaintiff to file the complaint in the form attached hereto.
4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 20, 2017

/s/ Clara R. Smit, Esq.

Clara R. Smit, Esq.  
Attorney for Plaintiff